

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN D. HANSON,
[DOB: 09-01-1984]

SEAN BOND,
[DOB: 01-04-1976]

BRENDA SUE SWEARINGIN,
[DOB: 04-21-1958]

JORGE TORRES, JR.,
[DOB: 11-03-1983]

Defendants.

Defendants/Counts

Hanson: 1, 9

Bond: 1-5, 9, and FA1

Swearingin: 1, 6-8 and FA2

Torres: 1 and 5

No. 13-03103-01/04-CR-S-JFM

COUNT 1

21 U.S.C. § 841(a)(1) and (b)(1)(A) and § 846
NLT 10 Years Imprisonment
NMT \$10,000,000 Fine
NLT 5 Years Supervised Release
Class A Felony

COUNTS 2 through 6

21 U.S.C. § 841(a)(1) and (b)(1)(D)
NMT 5 Years Imprisonment
NMT \$250,000 Fine
NLT 2 Years Supervised Release
Class D Felony

COUNT 7

18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment (consecutive to
Count 1)
NMT \$250,000 Fine
NMT 5 Years Supervised Release
Class A Felony

COUNT 8

18 U.S.C. §§ 922(g)(3) and 924(a)(2)
NMT 10 Years Imprisonment
NMT \$250,000 Fine
NLT 3 Years Supervised Release
Class C Felony

COUNT 9

18 U.S.C. § 1956(a)(1)(A)(i) and (h)
NMT 20 Years Imprisonment
NMT \$500,000 Fine
NMT 3 Years Supervised Release
Class C Felony

FORFEITURE ALLEGATION 1

21 U.S.C. § 853

FORFEITURE ALLEGATION 2
18 U.S.C. § 924(d)(1)

\$100 Special Assessment (Each Count)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute 1000 Kilograms or More of Marijuana)
21 U.S.C. § 841(a)(1) and (b)(1)(A)(vii) and § 846

Beginning on an unknown date, but at least as early as April 1, 2010, and continuing to on or about June 19, 2013, in Greene County, in the Western District of Missouri, and elsewhere, the defendants, **BRIAN D. HANSON, SEAN BOND, BRENDA SUE SWEARINGIN, and JORGE TORRES, JR.**, knowingly and intentionally conspired and agreed with each other and with others known and unknown to the Grand Jury, to distribute 1000 kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vii), all in violation of Title 21, United States Code, Section 846.

COUNT 2

(Distribution of Marijuana)
21 U.S.C. § 841(a)(1) and (b)(1)(D)

On or about August 29, 2011, in Greene County, in the Western District of Missouri, the defendant, **SEAN BOND**, knowingly and intentionally distributed marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT 3
(Distribution of Marijuana)
21 U.S.C. § 841(a)(1) and (b)(1)(D)

On or about September 12, 2011, in Greene County, in the Western District of Missouri, the defendant, **SEAN BOND**, knowingly and intentionally distributed marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT 4
(Distribution of Marijuana)
21 U.S.C. § 841(a)(1) and (b)(1)(D)

On or about October 5, 2011, in Greene County, in the Western District of Missouri, the defendant, **SEAN BOND**, knowingly and intentionally distributed marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT 5
(Distribution of Marijuana)
21 U.S.C. § 841(a)(1) and (b)(1)(D)

On or about May 23, 2012, in Greene County, in the Western District of Missouri, the defendants, **SEAN BOND and JORGE TORRES, Jr.**, knowingly and intentionally distributed marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT 6
(Distribution of Marijuana)
21 U.S.C. § 841(a)(1) and (b)(1)(D)

On or about March 4, 2013, in Greene County, in the Western District of Missouri, the defendant, **BRENDA SUE SWEARINGIN**, knowingly and intentionally distributed marijuana,

a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(D).

COUNT 7

(Possession of Firearm in Furtherance of Drug Trafficking Crime)
18 U.S.C. § 924(c)(1)(A)

On or about June 19, 2013, in Greene County, in the Western District of Missouri, the defendant, **BRENDA SUE SWEARINGIN**, knowingly possessed a firearm and ammunition, to wit: a loaded Taurus .22 magnum handgun, serial number #QF886327 and 30 Maxi-Mag Velocity .22 WMR bullets, in furtherance of drug trafficking crimes for which she may be prosecuted in a court of the United States, to wit: conspiracy to distribute marijuana, a controlled substance, as charged in Count 1 of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 8

(Drug User in Possession of a Firearm)
18 U.S.C. §§ 922(g)(3) and 924(a)(2)

On or about June 19, 2013, in Greene County, in the Western District of Missouri, the defendant **BRENDA SUE SWEARINGIN**, while the unlawful user of a controlled substance, namely marijuana, knowingly possessed, in and affecting interstate commerce, a firearm and ammunition, to wit: a loaded Taurus .22 magnum handgun, serial number #QF886327 and 30 Maxi-Mag Velocity; in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT 9

(Conspiracy to Commit Money Laundering)
18 U.S.C. § 1956(h)

Between at least as early as December 1, 2010, and June 19, 2013, said dates being approximate, in Greene County, within the Western District of Missouri and elsewhere the

defendants, **BRIAN D. HANSON**, and **SEAN BOND**, did knowingly and intentionally combine, conspire, confederate, and agree with others, both known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

(a) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and,

(b) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, with the intent to promote the carrying on of that specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

Manner and Means

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- a) During the course of the conspiracy, the defendant **BRIAN D. HANSON**, gave **SEAN BOND** a 2002 BMW 745i and an 1969 Chevrolet Chevelle to pay a drug debt. Subsequently, **BOND** transferred the title of the 2002 BMW 745i to his then girlfriend.
- b) On or about July 3, 2009, the defendant, **SEAN BOND**, purchased a Well Craft 3200 Martinique, which he registered in his father's name.
- c) On or about March 17, 2010, **BOND** purchased a 2007 Cadillac Escalade from Auto Rom, in Springfield, Missouri. **BOND** used this vehicle to distribute marijuana to customers in and around Springfield, Missouri.
- d) On or about September 13, 2012, **HANSON** purchased a 2003 Ford Crown Victoria from the 166 Auto Auction in Springfield, Missouri. **HANSON** used this vehicle to transport marijuana from Houston, Texas, and Kansas City, Missouri, to **BOND** in Springfield, Missouri.

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION 1 **21 U.S.C. § 853**

The allegations contained in Count 1, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the violations alleged in Count 1, the defendant, **SEAN BOND**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds the said defendants obtained, directly or

indirectly, as a result of the said violation, and any and all of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the said violation, including but not limited to:

- (1) 2002 BMW, 725i, VIN: WBAGL634X2DPJ0523, seized from **BOND** June 19, 2013;
- (2) 2007 Cadillac Escalade, VIN: 3GYFK62887G216592, seized from **BOND** June 19, 2013;
- (3) 2002 Firebird Pro-Mod RaceCar, 77001, seized from **BOND** June 19, 2013;
- (4) 1968 Chevrolet Camaro, VIN: 124378N1457484, seized from **BOND** June 19, 2013;
- (5) Blue Go-Kart, seized from **BOND** June 19, 2013;
- (6) Orange Go-Kart, seized from **BOND** June 19, 2013;
- (7) Yellow Go-Kart, seized from **BOND** June 19, 2013;
- (8) 2006 Haulmark Trailer, TH85X25WT3, White, VIN: 16HGB24266U046893, seized from **BOND** June 19, 2013;
- (9) 2004 Ford F350, VIN: 1FTWW33P04EB08792, seized from **HANSON** June 19, 2013;
- (10) Wellcraft Martinique Boat, WELCCA36L394, seized from **BOND** June 19, 2013.

FORFEITURE ALLEGATION 2
18 U.S.C. § 924(d)(1)

The allegations contained in Counts 7 and 8, above, are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d)(1).

As a result of committing offenses in violation of Title 18, United States Code, Sections 922 and 924, as charged herein, defendant, **BRENDA SUE SWEARINGIN**, shall forfeit to the

United States all firearms and ammunition involved in the particular aforesaid offenses as set forth above, including but not limited to:

1. a Taurus .22 magnum handgun, serial number QF88637, loaded with .22 caliber ammunition, seized from **SWEARINGIN** on June 19, 2013;
2. 30 Maxi-Mag Velocity .22 WMR bullets, seized from **SWEARINGIN** on June 19, 2013.

A TRUE BILL.

/s/
FOREPERSON OF THE GRAND JURY

Dated: 11/06/2013

/s/ Randall D. Eggert
RANDALL D. EGGERT
Assistant United States Attorney